

REMARKS

In the Office Action¹, the Examiner rejected claims 17-20 under 35 U.S.C. § 101 as directed to non-statutory subject matter; rejected claims 1-4, 9-12, 17, and 18 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,571,234 to Knight et al. ("Knight") in view of U.S. Patent Application Pub. No. 2005/0125504 to Leeds ("Leeds"); and rejected claims 6-8, 14-16, 19, and 20 under 35 U.S.C. § 103(a) as being unpatentable over *Knight* and *Leeds* in view of U.S. Patent No. 6,816,885 to Raghunandan ("Raghunandan").

Applicants have amended claims 1, 2, 6, 7, 9, 10, 14, 15, and 17-20. Claims 1-4, 6-12, and 14-20 are pending.

In light of the following remarks, Applicants respectfully request the Examiner's timely reconsideration and allowance of currently pending claims 1-4, 6-12, and 14-20.

I. The Rejection of Claims 17-20 Under 35 U.S.C. § 101

The Examiner alleges that "the claimed invention of a program ... is not statutory" (Office Action at p. 3). Amended claims 17-20 recite a statutory computer-readable storage medium and, accordingly, Applicants respectfully request the Examiner to withdraw the rejection.

II. The Rejection of Claims 1-4, 9-12, 17, and 18 under 35 U.S.C. § 103(a)

Applicant respectfully traverses the rejection of claims 1-4, 9-12, 17, and 18 under 35 U.S.C. § 103(a) because a *prima facie* case of obviousness has not been established.

¹ The Office Action contains statements reflecting characterizations of the related art and the claims. Regardless of whether any such statement is identified herein, Applicants decline to automatically subscribe to any statement or characterization in the Office Action.

To establish a *prima facie* case of obviousness, the prior art references (or references when combined) must teach or suggest all of the claim limitations. See M.P.E.P. § 2142, 8th Ed., Rev. 5 (August 2006). Moreover, “in formulating a rejection under 35 U.S.C. § 103(a) based upon a combination of prior art elements, it remains necessary to identify the reason why a person of ordinary skill in the art would have combined the prior art elements in the manner claimed.” USPTO Memorandum from Margaret A. Focarino, Deputy Commissioner for Patent Operations, May 3, 2007, p. 2.

A *prima facie* case of obviousness has not been established because, among other things, neither *Knight*, nor *Leeds*, taken alone or in combination, teaches or suggests each and every element of Applicants’ claims.

Independent claim 1, for example, recites a community-based collaborative knowledge system which can be connected to a plurality of client terminals via a network, wherein a “displayed window indicates [a] ... first subscription type is browsing by a web browser for [a] ... first virtual community, and indicates a second subscription type is using an email client for [a] ... second virtual community.” The cited references fail to teach or suggest at least these elements of independent claim 1.

Knight discloses an “online electronic message board system” including a network server connected to a user computer system (*Knight*, col. 8, line 15 to col. 9, line 4). However, in *Knight*, the only way a subscriber can use the online message board is via a web browser. *Knight*, Figs. 3B, 3C; col. 11, lines 21-31. Thus, *Knight* does not display a window “indicating a second subscription type is delivery via mail.” Therefore, *Knight* does not teach or suggest a “displayed window indicates [a] ... first subscription type is browsing by a web browser for [a] ... first virtual community, and indicates a second subscription type is using an email client for [a] ... second virtual community,” as recited in independent claim 1.

Leeds fails to cure the deficiencies in *Knight*. *Leeds* discloses a “system and method for adaptive forums provid[ing] multiple communication forums in a single instance of a web browser” (*Leeds*, abstract). *Leeds* also discloses a “forum-specific screen 400” with chat boxes associated with independent chat forums, and a navigator bar allows the user to modify the viewing environment (*Leeds*, ¶ 43 and FIG. 4). However, *Leeds* does not disclose displaying, within a window, a subscription type of browsing by a web browser and a description type of using an email client. Therefore, *Leeds* does not teach or suggest a “displayed window indicates [a] ... first subscription type is browsing by a web browser for [a] ... first virtual community, and indicates a second subscription type is using an email client for [a] ... second virtual community,” as recited in independent claim 1.

For at least the above reasons, *Knight* and *Leeds*, taken alone or in combination, fail to teach or suggest each and every element of independent claim 1. Therefore, no *prima facie* case has been established with respect to claim 1.

Furthermore, although of different scope than claim 1, amended independent claims 2, 9, 10, 17, and 18 are allowable for at least the same reasons as claim 1. Claim 3 depends from claim 2, claim 4 depends from claim 1, claim 11 depends from claim 10, and claim 12 depends from claim 9, and are allowable at least due to their dependence from allowable independent claims.

Because the cited references fail to teach or suggest each and every claim element recited by claims 1-4, 9-12, 17, and 18, no *prima facie* case of obviousness has been established with respect to these claims. Applicant, therefore, respectfully

requests the Examiner to withdraw the rejection of these claims under 35 U.S.C. § 103(a).

III. The Rejection of claims 6-8, 14-16, 19, and 20 under 35 U.S.C. § 103(a)

Applicant respectfully traverses the rejection of claims 6-8, 14-16, 19, and 20 under 35 U.S.C. § 103(a) because a *prima facie* case of obviousness has not been established.

A *prima facie* case of obviousness has not been established because, among other things, none of *Knight*, *Leeds*, or *Raghunandan*, taken alone or in combination, teaches or suggests each and every element of Applicants' claims.

Independent claims 6, 7, 14, 15, 19, and 20, although of different scope from independent claim 1, recite subject matter similar to that discussed above with respect to claim 1. Claim 8 depends from claim 6 and claim 16 depends from claim 14. As discussed, neither *Knight* nor *Leeds* teaches or suggests a "displayed window indicates [a] ... first subscription type is browsing by a web browser for [a] ... first virtual community, and indicates a second subscription type is using an email client for [a] ... second virtual community," as recited in independent claims 6, 7, 14, 15, 19, and 20, and required by claims 8 and 16 due to their dependence.

Raghunandan fails to cure the deficiencies of *Knight* and *Leeds*. *Raghunandan* discloses a "method, system and computer program product for intelligently handling a large volume of emails received from a plurality of senders" (*Raghunandan*, abstract). *Raghunandan*, however, is silent as to any subscription type, and thus fails to teach or suggest a "displayed window indicates [a] ... first subscription type is browsing by a web

browser for [a] ... first virtual community, and indicates a second subscription type is using an email client for [a] ... second virtual community."

Because the cited references fail to teach or suggest each and every claim element recited by claims 6-8, 14-16, 19, and 20, no *prima facie* case of obviousness has been established with respect to these claims. Applicant, therefore, respectfully requests the Examiner to withdraw the rejection of these claims under 35 U.S.C. § 103(a).

IV. Conclusion

In view of the foregoing, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 06-0916.

Respectfully submitted,

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